

18 July 2019

Technical Advisory Committee Secretariat  
GPO Box 858  
Canberra ACT 2601  
By email: [tacsecretariat@agriculture.gov.au](mailto:tacsecretariat@agriculture.gov.au)

Dear Secretariat,

The Australian Livestock Exporters' Council (ALEC) is a member-based, peak industry body representing Australia's livestock export sector. It sets industry policy, provides strategic direction to the industry and represents Australia's livestock export trade in Australia and internationally.

ALEC members account for more than 96 per cent of Australia's annual livestock exports, by volume and value. ALEC's membership also extends to supply chain participants including registered premise operators, ship owners, feed suppliers and other service providers to the trade.

Air transport occupies a small, but important, place in the shipment of Australian livestock to export markets and ALEC welcomes the opportunity to respond to the recommendations contained in the *Draft Report Review of the Australian Standards for the Export of Livestock: Air Transport* (the Draft Report).

The Australian Livestock Export Corporation Limited (LiveCorp) is a not-for-profit industry body funded by the statutory levies that are collected on all the live export of Australian sheep, goats and beef cattle, along with a voluntary levy collected on live dairy cattle exports. ALEC strongly supports the LiveCorp submission to the Draft Report, prepared with assistance from the LiveAir consultative committee. LiveCorp's submission therefore incorporates the research knowledge of LiveCorp, with the extensive practical and operational knowledge of the LiveAir consultative committee.

As detailed in the LiveCorp submission to the Draft Report, most recommendations are supported. However, there are recommendations with which ALEC do not agree or require amendments to enable support. The LiveCorp submission provides supporting evidence and/or proposes amendments for these draft recommendations which ALEC endorses.

It is imperative that recommendations made in the Draft Report, particularly those that will have an economic consequence, deliver tangible animal welfare improvements. There are recommendations that do not meet this necessary mark. A prime example is Recommendation 18 which seeks to institute a change to rounding regarding pen stocking density. Noting the excellent animal welfare outcomes achieved with air transport, this recommendation will significantly increase freight cost per head, directly impacting Australia's international competitiveness, without achieving quantifiable animal welfare improvements.



Requirements such as pregnancy tests for breeding livestock being deemed invalid after 30 days will lead to perverse animal welfare outcomes and refinements are required for recommendations regarding competent attendants. The amendments recommended in LiveCorp's submission are necessary.

It remains vitally important that the cost ramifications of changes to regulations is fully understood by the regulator, and as such, changes need to clearly demonstrate animal welfare improvements.

With regards,

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